

**PULLMAN & COMLEY, LLC**  
ATTORNEYS AT LAW

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**By U.S. Mail and Electronic Filing**

August 3, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, Second Floor  
Boston, MA 02110

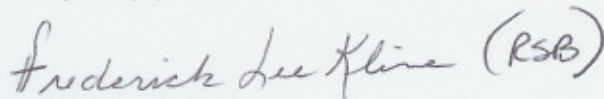
RE: Bay State Gas Company, D.T.E. 06-36

Dear Ms. Cottrell:

Enclosed please find an original and one copy of the Second Data Request of Hess Corporation for Bay State Gas Company

Thank you for your Consideration. Please let me know if you have any questions.

Very truly yours,



Frederic Lee Klein  
Pullman & Comley  
90 Statehouse Sq.  
Hartford, CT 06103

Cc: Electronic Service List

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

\_\_\_\_\_  
Bay State Gas Company  
\_\_\_\_\_

D.T.E.06-36

HESS CORPORATION  
SECOND SET OF INFORMATION REQUESTS

I. Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by Hess Corporation to the Company in this proceeding.

- 1) Please provide the response to each numbered request on a separate sheet of paper, or papers. Each sheet of paper should be three-hole punched.
- 2) For each response, please state (1) the name(s) and title(s) of the person(s) responsible for preparing the response, (2) the name(s) and title(s) of the person(s) who are competent to give testimony concerning the response and concerning all documents produced as part of the responses.
- 3) Where information requested is not available in the precise form described in the question, or is not available for all years indicated, please provide all information with respect to the subject matter of the question that can be identified in the Company's workpapers or files, or that is otherwise available.
- 4) As used in this information request, and in these instructions, "available" means within the party's knowledge, possession, or control, or within the party's power, capacity or ability to retrieve or obtain from an affiliate, a contractor, or any other source.
- 5) Please send copies of the responses to these information requests to:

Frederic Lee Klein  
Pullman & Comley  
90 Statehouse Sq.  
Hartford, CT 06103

Fax: 860 424 4370  
E-mail: [fklein@pullcom.com](mailto:fklein@pullcom.com)

Rebecca S. Bachelder  
Blueflame Consulting  
80 Warwick Road  
Melrose, MA 02176

E-mail: [rbachelder@bflame.com](mailto:rbachelder@bflame.com)

- 6) If any of the requests are unclear, or if the Company has any objections to the requests, please contact Fred Klein or Rebecca Bachelder at 860 424 4354 and 781-662-8584



respectively to discuss the matter. Please communicate any objections within 7 days of receipt so that Hess can rephrase or redirect the particular information request(s).

## **II. DATA REQUESTS FOR BAY STATE GAS COMPANY BY HESS CORPORATION**

### **Second Set**

- Hess 2-1. Has Bay State considered real time metering as used for its special contract customers instead of flow control metering to monitor over takes? What is the cost of real-time metering? What is the useful life of this type of metering?
- Hess 2-2. Please provide the aggregate design day MDQs of grandfathered customers separately for the Brockton Pool and the Springfield/Lawrence pools.
- Hess 2-3. Under what circumstances does Bay State adjust customer MDQs/TCQs?
- Hess 2-4. How does Bay State intend to represent the 30% reserve in its supply planning forecast? As a 365 day need? A 151 day need? A 10 day need? Or only a design day need?
- Hess 2-5. Please provide the following:
- a. the number of the largest customers associated with 50 percent of the grandfathered load,
  - b. the number of the largest customers associated with 75 percent of the grandfathered load,
  - c. the number of the largest customers associated with 90 percent of the grandfathered load.
- Hess 2-6. Has Bay State performed a comparative cost analysis between installing flow control meters on the grandfathered customers and a range of costs for the 30 percent reserve? If so, please provide such analysis.
- Hess 2-7. Regarding DTE 1-18 and Hess 1-13. At what point does Bay State read daily meters, process information and distribute it to marketers?
- Hess 2-8. Regarding Hess 1-26, when does Bay State anticipate the need for additional capacity in the Springfield and Lawrence divisions if a 30 % reserve is approved?
- Hess 2-9. Has Bay State sold delivered gas to its Northern affiliate or purchased delivered gas from its Northern affiliate in the last 5 years? If so, when? And how much?
- Hess 2-10. Regarding Hess 1-21. Has Bay State had to call upon its emergency plans in the past? If so, when, and what were the circumstances and the outcome?
- Hess 2-11. Has Bay State ever declared a marketer specific OFO? If so, what was the circumstance?